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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 JESS ELIJIO CARRANZA,
15 Defendant.

Case No. 2:19-cr-00310-RFB-BNW

**STIPULATION TO CONTINUE
TRIAL DATES**
(Seventh Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Daniel E. Clarkson, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Paul D. Riddle, Assistant Federal Public Defender, counsel for Jess Elijio Carranza, that
21 the calendar call currently scheduled for July 6, 2021 at 1:30 PM, and the trial scheduled for
22 July 12, 2021 at 9:00 AM, be vacated and set to a date and time convenient to this Court, but
23 no sooner than sixty (60) days.

24 The Stipulation is entered into for the following reasons:

25 1. Counsel for the defendant needs additional time to conduct investigation in this
26 case in order to determine whether there are any pretrial issues that must be litigated and
whether the case will ultimately go to trial or will be resolved through negotiations.

1 2. The parties agree to the continuance.
2 3. The defendant is in custody and agrees with the need for the continuance.
3 4. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow counsel for defendant sufficient time within which to be able to effectively and
5 complete investigation of the discovery materials provided.

6 5. Additionally, denial of this request for continuance could result in a miscarriage
7 of justice. The additional time requested by this Stipulation is excludable in computing the time
8 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
9 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
10 Section 3161(h)(7)(B)(i), (iv).

11 This is the seventh stipulation to continue filed herein.

12 DATED this 18th day of June, 2021.

13 RENE L. VALLADARES
14 Federal Public Defender

 CHRISTOPHER CHIOU
 Acting United States Attorney

15 By /s/ Paul D. Riddle

 By /s/ Daniel E. Clarkson

16 PAUL D. RIDDLE
 Assistant Federal Public Defender

 DANIEL E. CLARKSON
 Assistant United States Attorney

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